

Ryan E. Simpson (11300)  
Attorney for Debtor  
8839 South Redwood Rd, Ste C2  
West Jordan, UT 84088  
Telephone (801) 432-8682  
Fax 888-247-2541

IN THE UNITED STATES BANKRUPTCY COURT  
DISTRICT OF UTAH

IN RE:  GREGG SHEPPARD  Debtor(s).	Case No.: 18-27139 Chapter: 13  Judge: William T. Thurman
--	--

**DEBTORS OBJECTION TO MOTION FOR RELIEF**

Debtors in the above captioned Chapter 13 case, hereby moves the Court to deny US Bank National Association (hereinafter "Creditor") Motion for Relief. This Motion is based on the following:

1. Debtor listed an amount owing of \$4,500 on his Schedule D at the time of filing of the bankruptcy (See Court Docket).
2. Debtor signed a note for \$180,000 for a term of 20 years which was to be paid off in August 2018 (See Creditor's Exhibit "B").
3. Prior to the filing of this Bankruptcy Debtor with another attorney had been actively disputing the debt with Creditor which at the time was Wells Fargo. Wells Fargo claimed the loan had been modified back in early 2000 to a 40 years mortgage. Debtor denies ever entering into a loan modification with Creditor and Wells Fargo was unable to produce the modification documents. In lieu of resolving the matter, Wells Fargo then transferred the debt to

Selene Finance. Debtor has been attempting to resolve the matter with Selene Finance with no luck (the supporting documents and communications will be provided to counsel for Creditor).

4. Debtor contends that he has paid this note in full.

5. It is expected that Counsel for the parties will negotiate a mutual agreeable resolution to the present issues; and, it is believed that a settlement will be reached in the near future to cure the alleged delinquency over a reasonable amount of time.

6. Once such agreement has been achieved, it will be reduced to writing and presented to the Court. This precautionary response is filed only in the event the agreement is not finalized prior to the established deadline for the Debtors to respond.

WHEREFORE, debtors pray that the Motion for Relief be denied and that the court grant such other and further relief as is just.

DATED the 20th day of June, 2019.

By /s/ Ryan E. Simpson  
Ryan E. Simpson  
Attorney for the Debtors

CERTIFICATE OF SERVICE

I hereby certify that I mailed or caused to be mailed via ECF or US Mail, a correct copy of the foregoing document, postage prepaid, on the 17th day of June, 2019 to the following:

Office of the US Trustee                      via ECF

Lon A. Jenkins                                  via ECF  
Chapter 13 Trustee

Aaron M. Waite                              via ECF  
Weinstein & Riley, P.S.  
3703 West 6200 South  
Salt Lake City, Utah 84129

Gregg Sheppard  
10906 South Jason Drive  
Sandy, Utah 84094

/s/ Ryan E. Simpson